

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOHN GALLOWAY, Individually, and on)
behalf of all others similarly situated, et al.,)

Plaintiffs,)

v.)

Case No. 07-CV-6435 (DF)

APARTMENT INVESTMENT AND)
MANAGEMENT COMPANY, AIMCO)
PROPERTIES, L.P., NHP MANAGEMENT)
COMPANY AND AIMCO / BETHESDA)
HOLDINGS, INC.)

Defendants.)

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO HOLD PRE-TRIAL
CONFERENCE**

Plaintiffs respectfully request an extension of time to submit the Preliminary Pre-trial Statement, currently due on October 5, 2007, and to hold the Pre-Trial Conference, currently set for October 12, 2007, until a date after October 24, 2007. Defendants have stated they will not oppose Plaintiffs' request. Plaintiffs filed and served a First Amended Complaint on September 24, 2007 to add AIMCO / Bethesda Holdings, Inc. as a defendant, and have agreed with Defendants, subject to Court approval, that Defendants shall have 30 days to answer this complaint. In addition, the parties have agreed in principle upon a schedule for the litigation of this action, and are currently preparing a case management agreement outlining the discovery schedule which the parties will jointly propose for the Court's approval.

Plaintiffs respectfully suggest that the Pre-trial Conference, if necessary, be set for a date after October 24, 2007, by which time both the proposed Case Management Agreement and Defendants' Answer will have been filed.

Dated: October 4, 2007

Respectfully submitted,

/s/ Llezlie Green

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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day served the foregoing document upon the individual listed below via first class mail.

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Date: October 4, 2007

/s/ Llezlie L. Green
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